

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**IN THE MATTER OF:**

Huntington Aluminum, Inc.  
1605 Riverfork Drive  
Huntington, Indiana 46750

**ATTENTION:**

John Wonderly  
Environmental and Safety Manager

**Request to Provide Information Pursuant to the Clean Air Act**

The U.S. Environmental Protection Agency is requiring Huntington Aluminum, Inc. (Huntington or You) to submit certain information about the facility at 1605 Riverfork Drive, Huntington, Indiana. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit, and Appendix C outlines performance testing you must conduct. You must submit the required information and conduct the required testing according to the schedule outlined in each Appendix.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Huntington owns and operates an emission source at the Huntington, Indiana, facility. *We are requesting this information to determine whether your emission source is complying with the Indiana State Implementation Plan, the National Emission Standards for Hazardous Air*

Pollutants (NESHAP) for Secondary Aluminum Production at 40 C.F.R. Part 63, Subpart RRR, and your Federally Enforceable State Operating Permit.

Huntington must send all required information to:

Attn: Compliance Tracker, AE-18J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 W. Jackson Boulevard  
Chicago, Illinois 60604

Huntington must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix D, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment. Appendix D provides additional information regarding the meaning and scope of the term "emissions data."

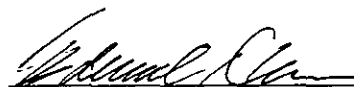
This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Huntington to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Sarah Clark at (312) 886-9733 or [clark.sarah@epa.gov](mailto:clark.sarah@epa.gov).

12/19/18  
Date

  
\_\_\_\_\_  
Edward Nam  
Director  
Air and Radiation Division

## **Appendix A**

When providing the information requested in Appendix B and Appendix C, use the following instructions and definitions.

### **Instructions**

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

### **Electronic Submissions**

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix D for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

### **Definitions**

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or National Emission Standards for Secondary Aluminum at 40 C.F.R. Part 63, Subpart RRR.

1. "ACGIH" refers to the American Conference of Governmental Industrial Hygienists.
2. "ACGIH Guidelines" refers to the references contained at 40 C.F.R. § 63.14(b)(1), (2), and (3).
3. "Bag leak detection system" or "BLDS" means an instrument that is capable of monitoring particulate matter loadings in the exhaust of a fabric filter (i.e., baghouse) in order to detect bag failures. A bag leak detection system includes, but is not limited to, an instrument that operates on triboelectric, light scattering, light transmittance, or other effect to monitor relative particulate matter loadings.
4. "Capture and collection system" means the system, including duct systems and fans, and, in some cases, hoods, used to collect a contaminant at or near its source, and for affected sources equipped with an air pollution control device, transport the contaminated air to the air cleaning device.
5. "Clean charge" means furnace charge materials, including molten aluminum; T-bar; sow; ingot; billet; pig; alloying elements; aluminum scrap known by the owner or operator to be entirely free of paints, coatings, and lubricants; uncoated/unpainted aluminum chips that have been thermally dried or treated by a centrifugal cleaner; aluminum scrap dried at 343 °C (650 °F) or higher; aluminum scrap delacquered/decoated at 482 °C (900 °F) or

higher; and runaround scrap. Anodized aluminum that contains dyes or sealants containing organic compounds is not clean charge.

6. The terms “document” and “documents” and “documentation” means any object that records, stores, or presents information, and includes: email; writings; memoranda; contracts; agreements; records; or information of any kind, formal or informal, whether handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy. All documents in hard copy shall also include attachments to or enclosures with any document.
7. “FESOP” means the Federally Enforceable State Operating Permit No. F069-33855-00085 issued by the Indiana Department of Environmental Management (IDEM) to Huntington on March 26, 2014, and subsequent revisions.
8. “Heat curtain” means a curtain made of a heat/flame-resistant material that is attached to the bottom of a canopy hood to improve capture and collection.
9. The term “Huntington” or “you” or “your” includes, but is not limited to: Huntington Aluminum, Inc. or any assumed business names, agents, representatives, employees, contractors, or other entities that performed work or acted in any way on behalf of, are related to, or acted at the direction of Huntington Aluminum, Inc.
10. “Sidewall” or “side wall” means a structure that is attached or closely adjacent to a canopy hood to improve capture and collection.
11. “Tap” means the end of an operating cycle of any individual furnace when processed molten aluminum is poured from that furnace.

## Appendix B

### Information You Are Required to Submit to EPA

Huntington Aluminum, Inc. (Huntington) must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) within **30 calendar days** of receiving this request. All questions refer to the facility located at 1605 Riverfork Drive, Huntington, Indiana (Facility):

1. If Huntington has updated the Operation, Maintenance, and Monitoring (OM&M) Plan for the Facility maintained pursuant to 40 C.F.R. § 63.1510(b) since responding to EPA's previous Request for Information dated April 30, 2018 (April Information Request), please provide a copy of the most current Plan.
2. Provide the date(s) of installation, first operation, expected start-up, and most recent emissions testing (or date of planned testing) for the "5.0 tph Rotary Reverberatory Melt Furnace" (#2 RRMF) and "#3 Baghouse" (BH #3).
3. In response to Requests 15 and 16 of the April Information Request, Huntington stated that "Operating hours are not currently recorded; however, Huntington is implementing procedures to record operating hours." In an unlocked **Excel-compatible spreadsheet**, provide the following records, as described in 40 C.F.R. § 63.1517(b)(7) and (17), for each aluminum furnace at the Facility from the date that Huntington began recording operating hours, to the date of receipt of this request:
  - a. feed/charge weights for each operating cycle (or time period used in the performance test);
  - b. daily operating hours; and
  - c. total aluminum processed (in tons) per day.
4. Identify all reactive and nonreactive flux added to one or more furnaces at the Facility from November 1, 2013, to the date of receipt of this request. For each such flux, including, but not limited to A-614-2, magnesium chloride ( $\text{MgCl}_2$ ), and any other salts, provide all records in an unlocked **Excel-compatible spreadsheet** of flux usage (in pounds) and flux injection rate (in pounds per ton of feed/charge) from November 1, 2013, to the date of receipt of this request. Also, include all internal inventories of the total amount of flux maintained as referenced in response to Request 18 of the April Information Request.
5. In an unlocked **Excel-compatible spreadsheet**, provide all records of lime addition, or lime feed, to Baghouse #1 for November 1, 2013, to the date of receipt of this request.
6. Provide the average batch cycle duration for the #1 RRMF, and provide the average batch cycle duration for the #2 RRMF if operational.

7. Please supplement your response to Request 13(c) of EPA's April Information Request by including the "limit calculation input" from your consultant. For the concentration limits Huntington provided in response to Request 13(d) of EPA's April Information Request, please clarify the units used. Additionally, where not already included in the "limit calculation input" or Huntington's response to Request 13(d), for the BLDS on Baghouse #1 and Baghouse #2, (and Baghouse #3 if operational), provide the current values of the following parameters (with units) and all supporting records related to the establishment of each parameter value as per EPA guidance and specifications for BLDS in 40 C.F.R. § 63.1510(f)(1):
  - a. baseline output,
  - b. range,
  - c. averaging period,
  - d. alarm set points, and
  - e. alarm delay time.
8. Provide all records from November 1, 2013, to the date of receipt of this request of each Bag Leak Detector sensitivity change and include an unlocked **Excel-compatible spreadsheet** containing the date of each change, the reason for each change, the amount the sensitivity was increased or decreased each time, and an indication of whether each adjustment followed a complete fabric filter inspection.
9. In response to Request 10 of EPA's April Information Request, Huntington stated "Melt Furnace Check Sheets are included with documentation of response to Bag Leak Detector (BLD) System warning alarms, temperature warning alarms and visual observations of issues of concern." EPA received spreadsheets containing pressure drop readings for Baghouse #1 and #2 but did not receive all of the information mentioned in the narrative. For November 1, 2013, to May 4, 2018, please supplement your original response with the documentation identified in your narrative and provide any additional records related to corrective actions taken to address an instance when one or more process parameters or air pollution control device operating parameters deviated from the value or range established during the performance test and/or incorporated in the OM&M plan.
10. In Huntington's response to Request 14 of EPA's April Information Request, the pressure drop readings for Baghouse #1 from July 22, 2016, to August 23, 2016, were labeled "See File," though EPA was not able to identify an associated file. Please supplement your response with the pressure drop readings for this period.
11. Provide current photographs and diagrams of each aluminum furnace and associated capture and collection system at the Facility, and for each furnace, indicate which sides, if any, are the side walls referenced in Huntington's response to Request 6(b) of EPA's April Information Request. Each diagram shall include the following:
  - a. positions and diameters of all duct openings on each hood;
  - b. dimensions of the molten bath;
  - c. dimensions of any openings (*i.e.*, loading, maintenance, *etc.*);
  - d. dimensions and position of any heat curtains;
  - e. dimensions of the fume hood; and
  - f. distance from the top of the molten bath to the bottom of the fume hood.



12. Provide schematics for all ducts within each aluminum furnace capture and collection system at the Facility. The schematics shall include, at least, the dimensions of each duct, including any changes in duct diameter, and the placement of any interferences (*e.g.*, branches, dampers) along each duct.

## **Appendix C**

### **Emissions Testing Requirements**

Huntington must respond to this information request pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) by performing testing at the Facility located at 1605 Riverfork Drive, Huntington, Indiana. Huntington must submit a test plan, conduct testing and submit all other information requested in accordance with the schedule specified below:

Submit Testing Protocol(s)	Within 30 calendar days of receipt of this request
Notification of Intent to Test	Not less than 21 calendar days before testing
Complete Testing	Within 90 calendar days of receipt of this request
Submit Testing Report	Within 30 calendar days of completion of testing

1. Within 90 calendar days after the receipt of this request, Huntington must perform the following performance tests on the units specified below:
  - a. Inspect all aluminum furnace capture and collection systems at the Facility pursuant to 40 C.F.R. § 63.1510(d)(2) and in accordance with Items 2 through 7 below. As part of each inspection, measure the volumetric flow rate, using EPA Methods 1 and 2, at a location in the ductwork downstream of the hoods that is representative of the actual volumetric flow rate without interference due to leaks, ambient air added for cooling, or ducts from other hoods.
  - b. For RMF #1 and RMF #2, quantify the mass emission rate of particulate matter (PM, PM10, PM2.5, including filterable and condensable), dioxins and furans (D/F), hydrochloric acid (HCl), and hydrofluoric acid (HF) using EPA Methods 1-5, 202, 23, and either 26 or 26A pursuant to 40 C.F.R. §§ 63.1511 and 63.1512, the FESOP, and in accordance with the requirements of Items 2 through 7 below. Huntington may elect to perform the HCl testing at both the inlet (at a point before lime is introduced to the system) and the outlet of the lime injection fabric filter. During the PM testing, Huntington shall conduct Method 9 readings to quantify opacity.
2. During the testing conducted pursuant to Item 1 above, Huntington shall operate the relevant process units under representative conditions expected to produce the highest level of HAP emissions. These conditions shall include the following:
  - a. for Items 1a and 1b, operate the capture and collection system in a representative configuration that minimizes uncaptured emissions and is consistent with ACGIH guidelines;
  - b. for Item 1b, operate at the maximum feed/charge rate (greater than 95% capacity);
  - c. for Item 1b, use feed/charge with the greatest contamination, such as used beverage cans, chips, and feed/charge that is coated with paint and/or oil; and

- d. for Item 1b, operate at a representative, maximum flux addition rate and using a representative flux composition that correspond with conditions 2(b) and 2(c);
  - e. for Item 1b, use the minimum lime-injection rate (in pounds of lime per ton of feed/charge) that you intend to use for normal operation.
- 3. During the testing conducted pursuant to Item 1 above, Huntington shall monitor and record the operating parameters for each relevant process unit and piece of air pollution control equipment, including the following:
  - a. for Item 1a:
    - i. capture and collection configuration;
    - ii. diameter of the duct where measurements are collected; and
    - iii. optionally, the output from at least one parametric monitoring instrument in accordance with 40 C.F.R. § 63.1510(d)(2)(i)-(iii) (e.g., differential pressure measured by a flow rate indicator installed and operated in accordance with 40 C.F.R. § 63.1510(d)(2)(ii)(A)-(E); capture and collection system's fan revolutions per minute or fan amperage according to 40 C.F.R. § 63.1510(d)(2)(iii)(A))
  - b. for Item 1b:
    - i. the feed/charge rate and type (e.g., chips);
    - ii. flux injection rate, including the time and weight, identity, composition, and location (i.e., sidewall, hearth) of each addition of flux;
    - iii. lime injection rate, including the time and weight of lime added and any additional parameters required for any Huntington-specific applicable approved alternative lime addition monitoring method;
    - iv. inlet gas temperature, recorded every 15 minutes during HCl and D/F tests;
    - v. pressure differential across the fabric filter; and
    - vi. level of molten aluminum during each flux injection.
- 4. Within 30 calendar days after receipt of this request, Huntington shall submit to EPA and IDEM the proposed testing protocol(s) that completely describes the methods and procedures for testing at each emission unit identified in Item 1 (i.e., all aluminum furnace capture and collection systems for Item 1a; RMF #1 and RMF #2 for Item 1b). Huntington shall submit the proposed testing protocol via e-mail to Sarah Clark at [clark.sarah@epa.gov](mailto:clark.sarah@epa.gov) and to IDEM through Dave Cline at [DCLINE@idem.IN.gov](mailto:DCLINE@idem.IN.gov) and [Test\\_Protocol@idem.IN.gov](mailto:Test_Protocol@idem.IN.gov). EPA will provide approval or comments on the proposed testing protocol(s) via e-mail. The proposed testing protocol(s) shall contain, at a minimum, the following:
  - a. Complete description of the methods and procedures for testing at each unit, including identification of all relevant parameters and location of sampling;

- b. Planned feed/charge rate and type for testing conducted pursuant to Items 1a and 1b, and planned flux addition rate, identity, composition, and location and lime injection rate for testing conducted pursuant to Item 1b;
  - c. Narrative explaining the lime addition procedure (for testing conducted pursuant to Item 1b);
  - d. Description of how each operating parameter, including each parameter listed in under Item 3, will be monitored and recorded to demonstrate adherence to Items 1-3 of this information request;
  - e. Description of the capture and collection configuration and procedures that will be utilized to minimize unmeasured emissions; for example, verifying that all heat curtains are in place where required to meet ACGIH guidelines; and
  - f. All other information needed to fully address the requirements of Items 1-3 of this information request.
5. At least 21 calendar days prior to the planned test date(s), Huntington shall submit notification to EPA and IDEM of its intent to perform emission testing. Huntington shall submit this notice by e-mail to Sarah Clark at [clark.sarah@epa.gov](mailto:clark.sarah@epa.gov) and to IDEM through Dave Cline at [dcline@idem.IN.gov](mailto:dcline@idem.IN.gov) and [Test\\_Protocol@idem.IN.gov](mailto:Test_Protocol@idem.IN.gov).
6. Within 30 calendar days after completion of the tests conducted pursuant to Item 1, Huntington shall submit a complete report of the emissions testing on the Facility, including, at a minimum, the following:
- a. Summary of Results
    - i. Results of the above specified performance tests and opacity measurements; For testing conducted pursuant to Item 1a, the volumetric flow rate, in units of actual cubic feet per minute with temperature and standard cubic feet per minute, the duct gas velocity in units of feet per minute, and the duct diameter in units of inches shall be reported. For testing conducted pursuant Item 1b, the PM, D/F, HCl, and HF emission rates shall be reported in units consistent with 40 C.F.R. § 63.1505(i) and the FESOP;
    - ii. Date, time, and duration of each test run;
    - iii. Process and control equipment data related to determining compliance, including (for testing conducted pursuant to Item 1b) the feed/charge weight and type, flux addition weight, identity, and composition, lime injection rate (in units of pounds of lime per ton of feed/charge), three-hour block average inlet gas temperature, and pressure drop across the baghouse;
    - iv. Discussion of any test errors; and
    - v. Discussion of any deviations from the reference test methods and of any other problems encountered during the test.

b. Facility Operations

- i. For testing conducted pursuant to Item 1a, photographs and description of the capture and collection system and location of testing;
- ii. Description of the process and control equipment in operation during the test;
- iii. Operating parameters of the process units and pieces of air pollution control equipment; and
- iv. Facility operating parameters and data that demonstrate that the process units were operated in accordance with the requirements under Item 2.

c. Sampling and Analytical Procedures

- i. Sampling port location(s) and dimensions of cross-section;
- ii. Sampling point description, including labeling system;
- iii. Brief description of sampling procedures, including equipment and diagram;
- iv. Description of sampling procedures (planned and accidental) that deviated from any standard method;
- v. Brief description of analytical procedures, including calibration;
- vi. Description of analytical procedures (planned or accidental) that deviated from any standard method; and
- vii. Quality control/ quality assurance procedures, tests, and results.

d. Appendix

- i. Complete results with example calculations;
- ii. Raw field data (original, not computer printouts);
- iii. Laboratory report, with signed chain-of-custody forms;
- iv. Calibration procedures and results;
- v. Raw process and control equipment data, signed by plant representative;
- vi. Method 9 log sheets (for testing conducted pursuant to Item 1b);
- vii. Test log;
- viii. Project participants and titles; and
- ix. Related correspondence.



## **Appendix D**

### **Confidential Business and Personal Privacy Information**

#### **Assertion Requirements**

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B and Appendix C, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

## **Determining Whether the Information Is Entitled to Confidential Treatment**

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as



substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

### **Personal Privacy Information**

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

**CERTIFICATE OF MAILING**

I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by

Certified Mail, Return Receipt Requested, to:

John Wonderly  
Huntington Aluminum Inc.  
1605 Riverfork Drive  
Huntington, IN 46750


I also certify that I sent a copy of the Request to Provide Information Pursuant to the

Clean Air Act by E-mail to:

Phil Perry, Chief  
Air Compliance and Enforcement Branch  
PPERRY@idem.IN.gov

Matthew Chaifetz, Enforcement Case Manager  
Air Compliance and Enforcement Branch  
MChaifet@idem.IN.gov

On the 20<sup>th</sup> day of December 2018.

  
Kathy Jones, Program Technician  
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 70170660000036618342